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April 24, 2012

Via Hand Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Room TW-A325
Washington, DC 20554

FILED/ACCEPTED

APR 24 2012

Federal Communications Commission
Office of the Secretary

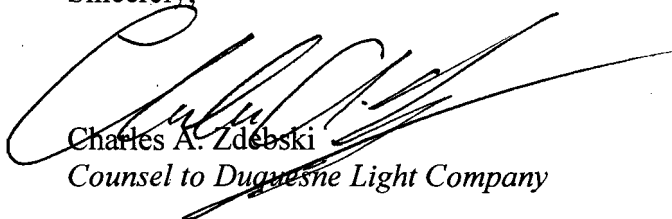
Re: In re Maritime Communications/Land Mobile, LLC
EB Docket No. 11-71
File No. EB-09-IH-1751
FRN: 0013587779

Dear Secretary Dortch:

Enclosed please find an original and four copies of Response of Undersigned Applicants to Request for Hearing for filing with the Commission. Please date stamp the fifth copy of this Response as having been received by your office and return it to the courier in attendance.

Thank you for your assistance in this matter.

Sincerely,



Charles A. Zdebski
Counsel to Duguesne Light Company

CAZ/ljk

Encls.

cc: The Honorable Richard L. Sippel (*via facsimile and email*)
Parties of Record (by U.S. Mail)

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FILED/ACCEPTED

APR 24 2012

Federal Communications Commission
Office of the Secretary

In the Matter of)	
)	
MARITIME COMMUNICATIONS/LAND)	EB Docket No. 11-71
MOBILE, LLC)	File No. EB-09-IH-1751
)	FRN: 001358779
Participant in Auction No. 61 and Licensee of Various)	
Authorizations in the Wireless Radio Services)	
)	
Applicant for Modification of Various Authorizations in)	
the Wireless Radio Services)	
)	Application File Nos. 0004030479,
Applicant with ENCANA OIL AND GAS (USA),)	0004144435, 0004193028,
INC.; DUQUESNE LIGHT COMPANY; DCP)	0004193328, 0004354053,
MIDSTREAM, LP; JACKSON COUNTY RURAL)	0004309872, 0004310060,
MEMBERSHIP ELECTRIC COOPERATIVE;)	0004314903, 0004315013,
PUGET SOUND ENERGY, INC.; ENBRIDGE)	0004430505, 0004417199,
ENERGY COMPANY, INC.; INTERSTATE)	0004419431, 0004422320,
POWER AND LIGHT COMPANY; WISCONSIN)	0004422329, 0004507921,
POWER AND LIGHT COMPANY; DIXIE)	0004153701, 0004526264,
ELECTRIC MEMBERSHIP CORPORATION,)	0004636537, 0004604962
INC.; ATLAS PIPELINE-MID CONTINENT,)	
LLC; DENTON COUNTY ELECTRIC)	
COOPERATIVE, INC., DBA COSERV)	
ELECTRIC; AND SOUTHERN CALIFORNIA)	
REGIONAL RAIL AUTHORITY)	
)	
For Commission Consent to the Assignment of Various)	
Authorizations in the Wireless Radio Services)	

To: Marlene H. Dortch, Secretary
Attn.: Chief Administrative Law Judge Richard L. Sippel

RESPONSE OF UNDERSIGNED APPLICANTS TO REQUEST FOR HEARING

The undersigned companies, collectively referred to in this proceeding as the
“Applicants,” hereby file this response to the request of Maritime Communications/Land Mobile,
LLC (“Maritime”), for a further conference before the Chief Administrative Law Judge. For the

reasons set forth below, the Applicants request that, if the Chief Administrative Law Judge orders a conference or hearing as requested by Maritime, any such order make plain that no issues related to the Applicants will be raised and that counsel for the Applicants need not participate in the conference.

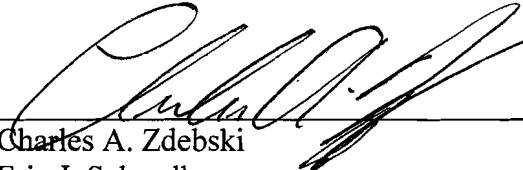
DISCUSSION

On April 19, 2012, Maritime filed its Request for Prehearing Conference (“Request”). In the Request, Maritime noted a variety of unresolved discovery disputes between it and the Enforcement Bureau. Maritime argued that “further pleadings will not adequately enlighten the presiding judge” and requested “a prehearing conference be held to air and discuss these matters, and hopefully [to] reach a definitive resolution.” Request at 2. Also on April 19, 2012, the Enforcement Bureau filed a “Limited Objection” to the Request that agreed to a narrowly-drawn conference.

Nothing in the current dispute between Maritime and the Enforcement Bureau implicates the Applicants. Although the Presiding Judge has indicated in the past that the Applicants are not required to participate in all such conferences, those conferences often have covered a wide number of issues (from Maritime’s assumption of the Applicants’ contracts in the bankruptcy, to *Second Thursday* timing and case-staging issues) affecting the Applicants.

In this instance, however, it appears that no issues raised by Maritime and the Enforcement Bureau relate to the Applicants. Accordingly, should the Presiding Judge grant Maritime’s request for a conference, the undersigned Applicants request that any such order also clarify that the issues to be considered in the conference will be limited to those raised by Maritime and the Enforcement Bureau in their most recent pleadings and will not regard the Applicants or require attendance of their respective counsel.

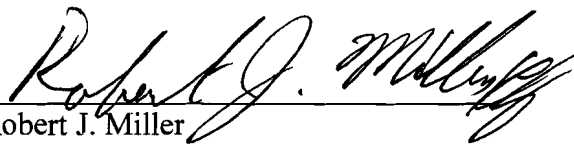
Respectfully submitted,


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Dated: April 24, 2012

CERTIFICATE OF SERVICE

I, Charles A. Zdebski, certify that on this 24th day of April, 2012, I caused a true and correct copy of the foregoing Response of Undersigned Applicants to Request for Hearing to be served via first-class mail, postage prepaid, upon:

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(Via facsimile and email)

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(Via Hand Delivery)


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